

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

IN RE: H&R BLOCK IRS FORM 8863)	MDL No. 2474
LITIGATION)	
)	Master Case No. 4:13-MD-02474-FJG
ALL ACTIONS)	
)	

**DECLARATION OF ERIC LECHTZIN IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF THE CLASS SETTLEMENT**

Pursuant to 28 U.S.C. §1746, I, Eric Lechtzin, hereby declare as follows:

1. I am a shareholder at Berger & Montague, P.C., and have been appointed as one of the temporary Co-Lead Counsel for Plaintiffs in this action.¹ I have been integrally involved in every aspect of this litigation, and I have personal knowledge of the facts contained herein. If called upon to do so, I could and would testify competently to the truth of the matters herein stated.

2. This Declaration is submitted in support of the parties' Joint Motion for Preliminary Approval of Class Action Settlement and Approval of Form and Dissemination of Class Notice.

3. To the extent not otherwise defined herein, all capitalized terms in this Declaration shall have the meaning assigned in the Settlement Agreement.

¹ The Plaintiffs in this action are Richard Dreyling, Maighan Dreyling, Taryn Knox, Tommi Head, Thomas James, Janet James, Kelley Mannix, Anatashia Wishon, Joseph Page, Lisa Rau, Kathleen Connelly-Brown, Bianca Venters, Twana Barrett, Nathan Poole, Jr., Kristy Fast, Timothy Fast, Darren Tucker, Ellen Tucker, Amy McAfee, Beverly Hand, Michelle Brantley, Brian Flaherty, Rachel Flaherty, Phillip Mann, Cynthia Brice, Debra Dodge, Michael Dodge, Steven Scott, Misty Scott, Robert Lefebvre, Julie Lefebvre, LaTisha Johnson's (collectively, "Plaintiffs")

4. Temporary Co-Lead Counsel for Plaintiffs, Sherrie R. Savett and Eric Lechtzin of Berger & Montague, P.C., J. Gordon Rudd, Jr. and David M. Cialkowski of Zimmerman Reed, PLLP, and Eric Holland and R. Seth Crompton of Holland Law Firm, has extensive experience and expertise in prosecuting complex consumer class actions and MDLs across the country. Such experience is set forth at length in the firm resumes of Co-Lead Counsel for Plaintiffs, as follows:

- (a) **Exhibit 1** is a true and correct copy of the Zimmerman Reed, P.L.L.P. firm resume.
- (b) **Exhibit 2** is a true and correct copy of the Berger & Montague, P.C. firm resume.
- (c) **Exhibit 3** is a true and correct copy of the Eric D. Holland's curriculum vitae.

5. The Settlement Agreement was the result of arm's-length negotiations between the parties. The material terms of the Settlement Agreement were realized after 6 months of negotiations, consisting of numerous telephonic conferences and e-mail communications between counsel for the parties beginning in March 2015 and continuing through September 2015.

6. The negotiations were informed by Co-Lead Counsel for Plaintiffs' investigations of the facts and assessments of this case's strengths and weaknesses and the anticipated costs and risks of proceeding to trial. The Settlement is structured in such a way as to adequately account for those strengths and weaknesses.

7. The Settlement Agreement is not the result of collusion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and recollection.

Executed this 16th day of December, 2015

/s/ Eric Lechtzin
Eric Lechtzin